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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 TERRELL DESHON KEMP, SR.,

14 Plaintiff,

15 vs.

16 LAS VEGAS METROPOLITAN POLICE
17 DEPARTMENT, et al.,

18 Defendants.

CASE NO: 2:18-cv-00169-RFB-BNW

19 **STIPULATION AND ORDER TO EXTEND**
20 **TIME FOR PLAINTIFF TO RESPOND TO**
21 **DEFENDANTS' MOTIONS FOR**
22 **SUMMARY JUDGMENT**
23 (Fourth Request)

24 COMES NOW, Plaintiff Terrell Deshon Kemp, Sr., ("Plaintiff"), by and through his
25 counsel, Trevor J. Hatfield, Esq. of the law firm of Hatfield & Associates, Ltd., appearing *pro*
26 *bono publico*, and Defendants Las Vegas Metropolitan Police Department ("LVMPD"), and
27 Defendants Captain Nita Schmidt and Officer Hugh Hardy, ("LVMPD Officers") by and through
28 their counsel, Lyssa S. Anderson, Esq., of the law firm of Kaempfer Crowell, and hereby
stipulate and agree to extend the time for Plaintiff to Respond to Defendants' Motions for
Summary Judgment (ECF #85 and ECF #86) due on July 21, 2021 to August 20, 2021.

1 This request is submitted pursuant to LR IA 6-1, 6-2 and 7-1 and is the parties' fourth
2 request for an extension of time for Plaintiff to respond to Defendants' Motions for Summary
3 Judgment.

4 Good cause exists for this extension, as Plaintiff is incarcerated in Ely State Prison and
5 Plaintiff's Counsel has had difficulty communicating with him to formulate oppositions to
6 Defendants' Motions for Summary Judgment and has only been able to communicate via U.S.
7 Mail after Plaintiff had saved money to purchase postage. Additionally, Defendants' have filed
8 two Motions for Summary Judgment in this matter which are comprised of voluminous
9 documentation for Plaintiff's counsel and Plaintiff to review to formulate the Oppositions to the
10 Motions for Summary Judgment. Moreover, Plaintiff is scheduled to speak with his counsel on
11 June 22, 2021, and settlement may be explored whereby the motions may be moot if settlement
12 is reached.
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Accordingly, Plaintiff shall have up to and including August 20, 2021, to respond to Defendants' LVMPD's and LVMPD Officers' Motions for Summary Judgment (ECF #85 and ECF #86).

Dated this 21st day of July, 2021

Dated this 21st day of July, 2021

HATFIELD & ASSOCIATES

KAEMPFER CROWELL

/s/ Trevor J. Hatfield

/s/ Lyssa S. Anderson

By: _____
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*Attorneys for Las Vegas Metropolitan
Police Department, Captain Nita Schmidt
and Officer Hugh Hardy*

IT IS SO ORDERED:

ORDER



RICHARD E. BOULWARE, II
United States District Court

DATED this 23rd day of July, 2021.

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